

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

NETWORK SYSTEM TECHNOLOGIES,
LLC,

Plaintiff,

v.

TEXAS INSTRUMENTS INCORPORATED
and FORD MOTOR COMPANY,

Defendants.

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Civil Action No. 2:22-cv-00482-RWS

JURY TRIAL DEMANDED

**JOINT MOTION FOR EXTENSION TO FILE AGREED DOCKET
CONTROL ORDER, DISCOVERY ORDER AND PROTECTIVE ORDER**

Plaintiff Network System Technologies, LLC and Defendants Texas Instruments Incorporated and Ford Motor Company respectfully file this Joint Motion for Extension to File Agreed Docket Control Order, Discovery Order and Protective Order, and would show as follows:

I.

The Court previously entered an Order setting a scheduling conference (Docket 35) setting a deadline for the parties to file a joint proposed docket control order, joint proposed discovery order, and a joint proposed protective order 7 days prior to the scheduling conference. The scheduling conference is set May 2, 2023, and the parties' deadline for filing the agreed proposed orders is April 25, 2023.

II.

The parties have been diligently conferring and exchanging proposed orders to come to an agreement to meet the Court's deadline. The parties are very close to having the final agreed documents for submission, but would request until April 28, 2023 to file the final proposed orders.

III.

This short request for an extension is not sought for the purpose of delay, but only to fully comply with the Court's order in finalizing the proposed orders to be presented to the Court.

For the foregoing reasons, the parties respectfully request leave for the parties to file the proposed docket control order, proposed discovery order, and proposed protective order on or before April 28, 2023.

Date: April 25, 2023

Respectfully submitted,

/s/ William E. Davis, III

William E. Davis, III
DAVIS FIRM PC
213 N. Fredonia Street, Suite 230
Longview, TX 75601
(903) 235-2588
bdavis@davisfirm.com

Daniel S. Stringfield
NIXON PEABODY LLP
70 West Madison St., Suite 5200
Chicago, IL 60602
(312) 977-4130
dstringfield@nixonpeabody.com

Erica J. Van Loon
Vincent Capati
NIXON PEABODY LLP
300 S. Grand Avenue, Suite 4100
Los Angeles, CA 90071
(213) 629-6000
evanloon@nixonpeabody.com
vcapati@nixonpeabody.com

*Attorneys for Plaintiff Network System
Technologies, LLC*

/s/ Ranganath Sudarshan
Robert T. Haslam (lead counsel)

rhaslam@cov.com

Anupam Sharma

asharma@cov.com

Hyun S. Byun

hbyun@cov.com

COVINGTON & BURLING LLP

3000 El Camino Real

5 Palo Alto Square

Palo Alto, CA 94306-2112

Telephone: (650) 632-4700

Facsimile: (650) 632-4800

Ranganath Sudarshan

rsudarshan@cov.com

COVINGTON & BURLING LLP

One City Center

850 Tenth Street, NW

Washington, DC 20001-4956

Telephone: (202) 662-5346

Facsimile: (202) 778-5346

Amanda Abraham

aa@rothfirm.com

The Roth Law Firm

115 N. Wellington, Suite 200

P O Box 876

Marshall, TX 75671-0876

Telephone: 903-935-1665

Fax: 903-935-1797

Wesley Hill

wh@wsfirm.com

Ward, Smith & Hill, PLLC

1507 Bill Owens Parkway

Longview, TX 75604

Telephone: 903-757-6400

Fax: 903-757-2323

Attorneys for Defendant

Texas Instrument Incorporated

Respectfully Submitted

/s/ Jennifer P. Ainsworth

Charles J. Monterio, Jr. (lead counsel)

CJMonterio@venable.com

Justin E. Pierce

JEPierce@venable.com

Venable LLP

600 Massachusetts Avenue, NW

Washington, D.C. 20001

Telephone: (202) 344-4569

Facsimile: (202) 344-8300

J. Daniel Kang

JDKang@venable.com

Venable LLP

1270 Avenue of the Americas, 24th

FL

New York, NY 10020

Telephone: (212) 307-5500

Facsimile: (212) 307-5598

Jennifer P. Ainsworth

TX State Bar No. 00784720

jainsworth@wilsonlawfirm.com

Wilson, Robertson & Cornelius, P.C.

909 ESE Loop 323, Suite 400

Tyler, Texas 75701

Telephone: (903) 509-5000

Facsimile: (903) 509-5092

Attorneys for Defendant

Ford Motor Company

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record are being served on April 25, 2023 with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ William E. Davis, III
William E. Davis, III

CERTIFICATE OF CONFERENCE

The undersigned certifies that counsel have complied with the meet-and-confer requirements of Local Rule CV-7(h) and (i) and that the foregoing motion is joined in its entirety by Plaintiff and Defendants.

/s/ William E. Davis, III
William E. Davis, III